IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

NIKKO D'AMBROSIO,

Plaintiff,

v.

ABBIGAIL RAJALA, et al.,

Defendants.

Case No. 1:24-cv-00678

Hon. Sunil R. Harjani

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND

Defendants Spill the Tea, Inc., Paola Sanchez, and Blake Millbrand (collectively, "Defendants"), by and through their undersigned counsel, respectfully move for an extension of time through and including August 28, 2024 to answer or otherwise respond to plaintiff Nikko D'Ambrosio's First Amended Complaint in this matter (Dkt. #29). In support of this motion, Defendants state as follows:

- 1. On or about January 25, 2024, Plaintiff filed this suit. (Dkt. #1)
- 2. On July 3, 2024, the Court issued a Minute Order allowing for Plaintiff to file an amended complaint by July 19, 2024, and for Defendants to respond by July 31, 2024. (Dkt. #28)
- 3. On July 22, 2024, given General Order 24-0021 granting a District-wide extension of time for any filings due on July 19, 2024 in light of connectivity problems, Plaintiff filed his First Amended Complaint. (Dkt. #29)
- 4. Due to undersigned counsel's pre-planned travel and other case schedules, and to most efficiently respond to the First Amended Complaint on behalf of all three Defendants,

Defendants respectfully request a 28-day extension of time to August 28, 2024 to answer or

otherwise respond to the First Amended Complaint.

5. Prior to filing this motion, counsel for Defendants conferred with Plaintiff's counsel

regarding the relief sought by this motion. Plaintiff's counsel represented that Plaintiff has no

objection to Defendants' requested extension of time.

6. This is Defendants' first request for extension of time to answer or otherwise

respond to the First Amended Complaint. This request is sought in good faith and not for purposes

of delay. No prejudice or substantial delay will result if Defendants' request for extension of time

is granted.

WHEREFORE, Defendants Spill the Tea, Inc., Paola Sanchez, and Blake Millbrand

respectfully request that the Court grant their Unopposed Motion for Extension of Time to Answer

or Otherwise Respond, enter an order extending Defendants' time to answer or otherwise respond

through and including August 28, 2024, and award such other and further relief the Court deems

just and proper under the circumstances.

TABET DIVITO & ROTHSTEIN LLC

Dated: July 29, 2024

Respectfully submitted,

SPILL THE TEA, INC.,

PAOLA SANCHEZ, and

BLAKE MILLBRAND

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By: /s/ Amanda N. Catalano

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